



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGIONS 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

September 27, 2005

REPLY TO THE ATTENTION OF:

**VIA FEDERAL EXPRESS**  
**RETURN RECEIPT REQUESTED**

**RRG Clayton Chemical Site (soil  
removal)**

Klaus Peter Loebbe, President  
BASF Corporation  
100 Campus Drive  
Florham Park, NJ 07932

EPA Region 5 Records Ctr.



285022

RE: Clayton Chemical Site General Notice of Potential Liability  
letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;
2. Provide security for the site;
3. Sample, characterize, and consolidate for removal and disposal

material found on-site;

4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.

5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPs that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency has initially notified all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of 72 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 72 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only notice the 72 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 72 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice additional PRPs identified in the aforementioned report.

The initial group of 72 PRPs were issued a General Notice of Liability letter by the Agency in November of 2004. A list of the 72 PRPs that were previously notified by the Agency is attached for your information and review. You are receiving this notice because the Agency further analyzed the volumetric ranking and found that your company also contributed 75,000 gallons or more to the Site.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after receipt of this letter, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.

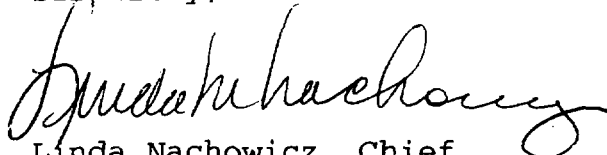
Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner  
Associate Regional Counsel  
U.S. EPA - Region V  
Office of Regional Counsel (C-14J)  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at, (312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,



Linda Nachowicz, Chief  
Emergency Response Branch

Attachment: A-General Notice PRP list.

**ATTACHMENT A**

**List Of Potential Responsible Parties Receiving a General notice Letter**

RRG/CLAYTON CHEMICAL COMPANY  
RRG/Clayton Chemical Company  
c/o Sheldon D. Korlin, Esq.  
P.O. Box 1286  
Alton, IL 62002-1286

DENNIS BALLINGER REAL ESTATE  
Dennis Ballinger Real Estate  
119 W. William St., Suite 300  
Decatur, IL 62523-1185

NASCOTE INDUSTRIES, INC.  
Margaret A. Coughlin Esq.  
Dickinson Wright, PLLC  
38525 Woodward Ave.  
Bloomfield Hills, MI 48304-2970

FORD MOTOR COMPANY  
Sir Nicholas V. Scheele, President  
Ford Motor Company  
One American Road  
Dearborn, MI 48126

SIGMA-ALDRICH CORPORATION  
Mr. Jai Nagarkatti, President  
Sigma-Aldrich Corporation  
3050 Spruce Street  
St. Louis, MO 63103

MALLINCKRODT INC.  
Mr. Peter S. Strassner,  
Thompson Coburn LLP  
One US Bank Plaza  
St. Louis, MO 63101-1693

BLISS WASTE OIL COMPANY  
Mr. Jerry Bliss, Owner  
Bliss Waste Oil Company  
149 Strecker Road  
Ballwin, MO 63011

A-1 OIL CORPORATION  
Mr. Jerry Bliss, Registered Agent  
A-1 Oil Corporation  
149 Strecker Road  
Ballwin, MO 63011

DAIMLERCHRYSLER CORPORATION  
Mary Ericson Waters,  
Daimler-Chrysler Corporation  
1000 Chrysler Drive  
Auburn Hills, MI 48326-2766

LEAR CORPORATION  
Mr. David W. Nunn  
Eastman & Smith Ltd.  
One SeaGate, 24<sup>th</sup> Floor  
Toledo, OH 43699

U.S. PAINT CORPORATION  
Mr. John Duchardt, President  
U.S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103

STERLING LACQUER MANUFACTURING COMPANY  
Mr. Leo V. Mitchell, President  
Sterling Lacquer Manufacturing Company  
3150 Brannon Ave.  
St. Louis, MO 63139

SUPERIOR EQUIPMENT COMPANY, INCORPORATED  
Bruce A. Morrison Esq.  
Green, Hennings & Henry, LLP  
705 Olive Street  
St. Louis, MO 63101-2208

THE SWAN CORPORATION  
Greensfelder, Hemker & Gale, P.C.  
2000 Equitable Building  
St. Louis, MO 63102-1774

PLASTIC PRODUCTS CO., INC.  
Ms. Marlene Messin, President  
Plastic Products Co., Inc.  
30355 Akerson Street  
Lindstrom, MN 55045

UOP LLC  
Mr. Carlos Guimaraes, President  
UOP LLC  
25 East Algonquin Road  
Des Plaines, IL 60016

NATIONAL COATINGS INC  
Mr. James Hillhouse, President  
National Coatings, Inc.  
604 US Highway 160 East  
Galesburg, IL 61401

CERRO FLOW PRODUCTS, INC.  
Richard F. Ricci Esq.  
Lowenstein Sandler PC  
65 Livingston Avenue  
Roseland, NJ 07068-1791

NORTH EAST RECYCLING TRANSPORTATION, INC.  
James P. Oliver Esq., Registered Agent  
Squire, Sanders & Dempsey L.L.P.  
for North East Recycling Transportation, Inc.  
Cleveland, OH 44114

OLIN CORPORATION  
Ms. Lorraine M. Miller  
Principal Environmental Specialist  
Olin Corporation  
1186 Lower River Road NW  
Charleston, TN 37310

MONSANTO COMPANY  
Mr. Hugh Grant, President  
Monsanto Company  
800 N. Lindbergh Blvd.  
St. Louis, MO 63167

HUSSMAN CORPORATION  
Ms. Donna K. Bryant McMahon  
Hussman Corporation  
155 Chestnut Ridge Rd.  
Montrale, NJ 07645

SEQUA CORPORATION  
Mr. Jon Santangelo  
Stinson Morrison Hecker  
100 South Fourth, Suite 700  
St. Louis, MO 63102

BOBEN MANUFACTURING COMPANY  
Mr. Robert H. Slosberg, Registered Agent  
Boben Manufacturing Company  
11 Nantucket Ln.  
St. Louis, MO 63132

AAD DISTRIBUTION & DRY CLEANING SERVICES,  
INC.  
Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat  
for AAD Distribution and Dry Cleaning Services, Inc.  
5107 Enfield Avenue  
Encino, CA 91316

TEVA PHARMACEUTICALS USA, INC.  
Gail S. Port Esq.  
Proskauer Rose, LLP  
1585 Broadway  
New York, NY 10036

DIOSYNTH, INC.  
Robin Hall  
Akzo Nobel, Inc.  
525 W. Van Buren Street  
Chicago, IL 60607

COLEMAN CHEMICAL, INC.  
Mr. Albert R. Puntureri, President  
Coleman Chemical, Inc.  
75 Sanger St.  
Peoria, IL 61602

NORFOLK SOUTHERN RAILWAY COMPANY  
Mr. Charles W. Moorman, President  
Norfolk Southern Railway Company  
3 Commercial Place  
Norfolk, VA 23510

MCINTYRE GROUP, LTD.  
Eric E. Boyd Esq.  
Seyfarth Shaw LLP  
55 E. Monroe St.  
Chicago, IL 60603

EXXONMOBIL OIL CORPORATION  
Mr. Rex W. Tillerson, President  
ExxonMobil Oil Corporation  
5959 Las Colinas Blvd.  
Irving, TX 75039-2298

CHICAGO DRUM, INC.  
Mr. Buddy Ross, President  
Chicago Drum, Inc.  
6829 Flintlock Road  
Houston, TX 77040

UNIVERSAL PACKAGING CORPORATION  
Ms. Gloria Cobb, President  
Universal Packaging Corporation  
4761 Moline Street  
Denver, CO 80239

WALKER PADUCAH CORP.  
Ms. Tara R. Ertischek, Corporate Counsel  
Walker Paducah Corp.  
4400 Harding Road  
Nashville, TN 37205

SAFETY-KLEEN SYSTEMS, INC.  
Frederick J. Florjancic Jr., President & CEO  
Safety-Kleen Systems, Inc.  
5400 Legacy Dr.  
Plano, TX 75024

TNEMEC COMPANY, INC.  
Mr. Andrew J. Bailey  
Blackwell Sanders Peper Martin LLP  
4801 Main St., Suite 1000  
Kansas City, MO 64112

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY  
Mr. Gary L. Rainwater, President  
Central Illinois Public Service Company  
One Ameren Plaza  
St. Louis, MO 66149

LYON METAL PRODUCTS, L.L.C.  
Patrick M. Kinnally Esq.  
Kinnally, Krentz, Loran, Hodge & Herman, P.C.  
for Lyon Metal Products LLC  
P.O. Box 5030  
Aurora, IL 60507-5030

RILEY BROTHERS COMPANY  
Mr. James S. Jennison, President  
Jennison Industries, Inc.  
for Riley Brothers Company  
106 Washington Avenue  
Burlington, IA 56201

TITAN WHEEL CORPORATION OF ILLINOIS  
Mr. Ronald B. Schildt, President  
Titan Wheel Corporation of Illinois  
2701 Spruce Street  
Quincy, IL 62301

SILGAN CONTAINERS CORPORATION  
Mr. Dennis Cornish  
Director, Environmental Services  
Silgan Containers Corporation  
21800 Oxnard St., Suite 600  
Woodland Hills, CA 91367

INX INTERNATIONAL INK COMPANY  
Mr. Richard Clendenning, President  
INX International Ink Co.  
651 Bonnie Lane  
Elk Grove Village, IL 60007

**KEYSTONE CONSOLIDATED INDUSTRIES, INC.**

Mr. David Cheek, President  
Keystone Consolidated Industries, Inc.  
dba Keystone Steel & Wire Company  
7000 SW Adams Street  
Peoria, IL 61641

**AFTON CHEMICAL CORPORATION**

Ms. Ann T. Burks, Assistant Counsel  
New Market Services Corp.  
330 South Fourth Street  
Richmond, VA 23219

**BEMIS COMPANY, INC.**

Mr. Jeffrey Curler, President  
Bemis Company, Inc.  
222 S. 9th St.  
Minneapolis, MN 55402

**STEELCOTE MANUFACTURING COMPANY**

Mr. John Milner, President  
Steelcote Manufacturing Company  
One Steelcote Square  
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**BAKER PETROLITE CORPORATION**

Ms. Halina E. Caravello  
Baker Petrolite Corporation  
12645 West Airport Blvd.  
Sugar Land, TX 77478

**IMPERIAL HOME DECOR GROUP, INC.**

Mr. Douglas R. Kelly, President  
Imperial Home Decor Group, Inc.  
23645 Mercatile Rd.  
Cleveland, OH 44122

**DON V. DAVIS COMPANY**

Ms. Ophelia Davis, Owner  
Don V. Davis Company  
5955 Goodfellow Blvd.  
St. Louis, MO 63147

**PENN ALUMINUM INTERNATIONAL, INC.**

John Nichols  
Penn Aluminum International, Inc.  
1117 North 2nd St.  
Murphysboro, IL 62966

**KOCH INDUSTRIES, INC.**

Mr. Christopher R. Graham, Senior Counsel  
Koch Industries, Inc.  
4111 E. 37th St. North  
Wichita, KS 67720

**VALENTEC WELLS, LLC**

President  
Valentec Wells, LLC  
Lake City Army Ammunition Depot, Bldg. 2  
Independence, MO 64051

**AMERICAN RECREATION PRODUCTS, INC.**

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**CHEMISPHERE CORPORATION**

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Chemisphere Corporation  
2101 Clifton Ave.  
St. Louis, MO 63139

**MARCHEM CORPORATION**

Ms. Penni Livingston  
Marchem Corporation  
4792 Benchmark Centre  
Swansea, IL 62226

**CURWOOD, INC.**

Mr. Tom Sall, President  
Curwood, Inc.  
2200 Badger Ave.  
Oshkosh, WI 54903



**THE KANSAS CITY SOUTHERN RAILWAY COMPANY**

Mr. Michael Haverty, President  
The Kansas City Southern Railway Company  
427 W. 12th St.  
Kansas City, MO 64121

**ARRIS INTERNATIONAL, INC.**

Mr. Gaines P. Carter  
Arris International, Inc.  
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Suwanee, GA 30042

**SAFETY-KLEEN (TS), INC.**

Mr. David M. Sprinkle, President  
Safety-Kleen (ts), Inc.  
5400 Legacy Dr.  
Plano, TX 75024

**MITSUBISHI MOTORS NORTH AMERICA, INC.**

Mr. Pierre M. Gagnon, President  
Mitsubishi Motors North America, Inc.  
6400 Katella Ave.  
Cypress, CA 90630

**THE DOW CHEMICAL COMPANY**

Ms. Rebecca L. Raftery  
Jenner & Block  
One IBM Plaza  
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**SUPERIOR OIL CO., INC.**

Mr. Ray Roembke Jr., President  
Superior Oil Co., Inc.  
400 W. Regent St.  
Indianapolis, IN 46225

**LYON WORKSPACE PRODUCTS, LLC**

Mr. R. P. Washington, Chairman  
Lyon Workspace Products, LLC  
420 North Main Street  
Montgomery, IL 60538

**NORDENIA U.S.A., INC.**

Julie O'Keefe Esq.  
Armstrong Teasdale, LLP  
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St. Louis, MO 63102-2740

**METAL CONTAINER CORPORATION**

Mr. Joseph P. Sellinger, President  
Metal Container Corporation  
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**ALLIED HEALTHCARE PRODUCTS, INC.**

Ms. Christina Archer  
Greensfelder Hemker & Gale  
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St. Louis, MO 63102

**CROWN BEVERAGE PACKAGING, INC.**

Mr. Robert J. Truitt, President  
Crown Beverage Packaging, Inc.  
One Crown Way  
Philadelphia, PA 19154

**CONOPCO, INC.**

Mr. Charles B. Strauss, President  
Conopco, Inc.  
700 Sylvan Ave.  
Englewood Cliffs, NJ 07632

**DJR HOLDINGS, INC.**

Mr. Rodney D. Jarboe, President  
DJR Holdings, Inc.  
1019 Skinker Parkway  
Hazelwood, MO 63042

**LINCOLN INDUSTRIAL CORPORATION**

Mr. Mark T. Schroepfer, President  
Lincoln Industrial Corporation  
One Lincoln Way  
St. Louis, MO 63120

**ARCHER-DANIELS-MIDLAND COMPANY**

Mr. Paul B. Mulhollem, President  
Archer-Daniels-Midland Company  
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(Mailed September 2005)

**ILLINOIS CENTRAL RAILROAD COMPANY**

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Illinois Central Railroad Company  
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Chicago, IL 60611  
(Mailed September 2005)